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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DANIEL VAZQUEZ,

FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "BZ," aka "Baz,"
ANGEL PEREZ, aka "Hellboy," aka "HB,"
aka "Fatboy"

)
) **Superseding Indictment**
)
) No. 13 CR 744
) Hon. Gary S. Feinerman
) **MAGISTRATE JUDGE VALDEZ**
) Violations: Title 21, United
) States Code, Sections
) 841(a)(1), 843(b) and 846; and
) Title 18, United States Code,
) Section 922(g)

JUDGE FEINERMAN **FILED**

COUNT ONE

APR 30 2014

THE SPECIAL MARCH 2013 GRAND JURY charges:

THOMAS G BRUTON
CLERK, U S DISTRICT COURT

1 Beginning no later than in or around 2009, and continuing to in

or around June 2013, at Chicago, in the Northern District of Illinois, Eastern
Division, and elsewhere,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "BZ," aka "Baz," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did conspire with each other, and with others known and
unknown to the Grand Jury, to knowingly and intentionally possess with
intent to distribute and distribute a controlled substance, namely, five
kilograms or more of a mixture and substance containing a detectable amount
of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture

and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about January 13, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL VAZQUEZ,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 3, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "BZ," aka "Baz," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 3, 2013, at approximately 9:24 a.m. (Call #792), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ,

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FIVE

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 3, 2013, at approximately 10:09 a.m. (Call #803), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ, and
FRANCISCO MIRELES, aka "Pac," aka "P,"

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SIX

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 3, 2013, at approximately 11:42 a.m. (Call #820), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ, and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVEN

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 3, 2013, at approximately 11:43 a.m. (Call #822), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ, and
ANWER SHAHBAZ, aka "BZ," aka "Baz,"

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHT

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 3, 2013, at approximately 3:25 p.m. (Call #939), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ, and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT NINE

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 15, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "BZ," aka "Baz," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 15, 2013, at approximately 1:49 p.m. (Call #2496), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ, and
FRANCISCO MIRELES, aka "Pac," aka "P,"

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about April 15, 2013, at approximately 7:31 p.m. (Call #2597), in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ, and
ANWER SHAHBAZ, aka "BZ," aka "Baz,"

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWELVE

THE SPECIAL MARCH 2013 GRAND JURY further charges:

On or about June 20, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "BZ," aka "Baz," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about June 20, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "Baz," aka "BZ," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, did knowingly possess a firearm, namely: a loaded Lorcin Model L22, .22 caliber semi-automatic pistol with a defaced serial number; a loaded Ruger Model P95, 9 mm semi-automatic pistol, bearing serial number 31776419; a loaded Smith & Wesson, .32 caliber revolver with a defaced serial number; a loaded Davis Industries Chino .32 revolver with a defaced serial number; a loaded Smith & Wesson, .40 caliber semi-automatic pistol, bearing serial number PDM8351; and a loaded SCCY Industry Model CPS-1, .380 caliber, bearing serial number 023568; in furtherance of a drug trafficking crime for which defendants may be prosecuted in a court of the United States, namely, conspiracy to possess with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about June 20, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL VAZQUEZ,

defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely: a loaded Lorcin Model L22, .22 caliber semi-automatic pistol with a defaced serial number; a loaded Ruger Model P95, 9 mm semi-automatic pistol, bearing serial number 31776419; a loaded Smith & Wesson, .32 caliber revolver with a defaced serial number; and a loaded Smith & Wesson, .40 caliber semi-automatic pistol, bearing serial number PDM8351; and a loaded SCCY Industry Model CPS-1, .380 caliber, bearing serial number 023568; which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm,

In violation of Title 18, United States Code, Section 922(g).

COUNT FIFTEEN

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about June 20, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

FRANCISO MIRELES, aka "Pac," aka "P,"

defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely: a loaded Smith & Wesson, .32 caliber revolver with a defaced serial number; and a loaded Davis Industries Chino .32 revolver; which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm,

In violation of Title 18, United States Code, Section 922(g).

FORFEITURE ALLEGATION ONE

The SPECIAL MARCH 2013 GRAND JURY alleges:

1. The allegations contained in Counts Thirteen through Fifteen of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).
2. As a result of his violations of Title 18, United States Code, Section 922(g) and 924(c), as alleged in this Indictment,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "Baz," aka "BZ," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title and interest they may have in any property involved in the charged offenses.

3. The interests of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c) are: (1) a Lorcini Model L22, .22 caliber semi-automatic pistol with a defaced serial number, and associated ammunition; (2) a Ruger Model P95, 9 mm semi-automatic pistol, bearing serial number 31776419, and associated ammunition; (3) a Smith & Wesson, .32 caliber revolver with a

defaced serial number, and associated ammunition; (4) a Smith & Wesson, .40 caliber semi-automatic pistol, bearing serial number PDM8351, and associated ammunition; (5) a SCCY Industry Model CPS-1, .380 caliber, bearing serial number 023568; (6) and Davis Industries Chino .32 revolver, and associated ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION TWO

The SPECIAL MARCH 2013 GRAND JURY further alleges:

1. The allegations of Counts One through Twelve of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846, as alleged in the foregoing Indictment,

DANIEL VAZQUEZ,
FRANCISCO MIRELES, aka "Pac," aka "P,"
ANWER SHAHBAZ, aka "BZ," aka "Baz," and
ANGEL PEREZ, aka "Hellboy," aka "HB," aka "Fatboy,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds they obtained, directly and indirectly, as a result of the violations; and (2) any and all of property used, or intended to be used, in any manner or part, to commit and facilitate the commission of the violations.

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853 include, but are not limited to:

a. approximately \$100,000, which includes \$5200 and \$23,245 seized on or about June 20, 2013;

b. a Lorcin Model L22, .22 caliber semi-automatic pistol with a defaced serial number, and associated ammunition, seized on June 20, 2013;

c. a Ruger Model P95, 9 mm semi-automatic pistol, bearing serial number 31776419, and associated ammunition seized on June 20, 2013;

d. a Smith & Wesson, .32 caliber revolver with a defaced serial number, and associated ammunition seized on June 20, 2013;

e. a Smith & Wesson, .40 caliber semi-automatic pistol, bearing serial number PDM8351, and associated ammunition, seized on June 20, 2013;

f. a SCCY Industry Model CPS-1, .380 caliber, bearing serial number 023568; and

g. a Davis Industries Chino .32 revolver and associated ammunition, seized on June 20, 2013.

4. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 21, United States Code, Section 853(p);

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY